



United States Department of Agriculture

United States
Department of
Agriculture

Animal and
Plant Health
Inspection
Service

Policy and Program
Development

Environmental and
Risk Analysis
Services, Unit 149
4700 River Road
Riverdale, MD 20737

May 23, 2018

Sent via electronic mail

Ms. Andrea Conrath

Biologist
Emergency Response Team
Registration Division-Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Ariel Rios Building
Washington, DC 20004

ATTN: Andrea Conrath, Biologist
Emergency Response Team

**SUBJECT: Quarantine Exemption Amendment (EPA File Symbol 18DA01);
Use of Acetic Acid Against Foot and Mouth Disease Virus**

Dear Ms. Conrath:

The United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) is requesting an amendment to a Federal Insecticide, Fungicide, Rodenticide Act Section 18 quarantine exemption for the use of acetic acid against the foot-and-mouth-disease virus (FMDV) (EPA File Symbol 18DA01). The exemption was approved for use on nonporous, nonfood/feed-contact surfaces. APHIS is now requesting the additional use of acetic acid on food/feed-contact surfaces during an FMDV outbreak. Food/feed-contact surfaces would include, but are not limited to, animal feed and watering equipment, slaughterhouse and processing plant-related equipment, and dairy-related equipment. EPA approved a similar request APHIS made for the use of citric acid on food/feed contact surfaces (EPA File Symbol 16DA01).

The approved use rate for the acetic acid exemption is 0.5%. Vinegar, which is made for human consumption, is approximately 5% acetic acid. The U.S. Food and Drug Administration indicates acetic acid is "generally recognized as safe when used in accordance with good manufacturing or feeding practice" (21 CFR 582.1005). APHIS believes that the use of acetic acid against FMDV on food/feed-contact surfaces in a widespread emergency would be extremely beneficial for stopping the spread of the disease, with little cost to human health or the environment.

Please find enclosed a proposed label with revisions highlighted. If you have any questions regarding this application, please contact Samantha Bates at (301) 851-3053, e-mail Samantha.Bates@aphis.usda.gov .

Sincerely,

Elizabeth E. Nelson, DrPH
Chief, Environmental and Risk Analysis Services
Policy and Program Development
USDA APHIS

cc: (sent electronically)
N. Birnbuam, USDA, APHIS, VS, Riverdale, MD

FIFRA SECTION 18 EMERGENCY EXEMPTION LABEL (Rev. 5/18/18)

AGENCY: U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS)

CHEMICAL: Acetic acid; CAS# 64-19-7

APPLICATORS: USDA–APHIS, other Federal, State, and local governments and the general public may apply vinegar. USDA–APHIS, other Federal, State, and local governments may apply commercial acetic acid.

% A.I.: 4 to 100%

PESTS: Foot and Mouth Disease Virus

USE SITES: Clean, hard, non-porous, food/feed and non-food/feed surfaces

DATE EXEMPTION

EXPIRES: April 19, 2020

USE DIRECTIONS: All applicable directions, restrictions, and precautions on the acetic acid label and Safety Data Sheet must be followed. To be used on clean, hard, non-porous, food/feed and non-food/feed items or surfaces potentially contaminated with FMDV. Treatments may be conducted at any location in the United States, including tribal lands, so long as they are not within the habitat of federally-listed plants and animals. Surfaces must be prepared by pre-cleaning and removing all visible extraneous organic matter, cleansed with detergent, rinsed and dried prior to treatment with the disinfectant mixture.

Prepare solutions by dissolving acetic acid in soft, moderately hard, or hard water up to 375 mg/L. Spray or wipe 0.5% acetic acid onto surfaces until visibly wet. Allow a ten minute contact time (i.e., keep surface visibly wet for the full ten minutes and reapply solution if necessary). A fresh solution must be prepared daily.

- Household vinegar is typically 4 to 8% acetic acid. To prepare 0.5% acetic acid from 4% acetic acid, add 1 part 4% acetic acid to 7 parts water. To prepare 0.5% acetic acid from 8% acetic acid, add 1 part 8% acetic acid to 15 parts water. Mix thoroughly.
- Commercial technical grade acetic acid is typically 80% to 85% acetic acid. Commercial technical grade acetic acid containing 80% acetic acid may be diluted to a 0.5% solution by adding 1 part of 80% acetic acid to 159 parts water. Commercial technical grade acetic acid containing 85% acetic acid may be diluted to a 0.5% solution by adding 1 part acetic acid to 169 parts water. Mix thoroughly.
- Commercial glacial acetic acid is typically 100% acetic acid. Commercial glacial acetic acid containing 100% acetic acid may be diluted to a 0.5% solution by adding 1 part acetic acid to 199 parts water. Mix thoroughly.

Commercial technical and glacial acetic acid

DANGER KEEP OUT OF REACH OF CHILDREN

Corrosive- causes irreversible eye damage. Wear goggles or face shield when handling. Harmful if absorbed through skin. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists. Wash thoroughly with soap and water after handling. Wear personal protection equipment when handling and/or applying.

Personal Protective Equipment (PPE): Applicators and other handlers must wear appropriate protective eyewear, such as face shield or goggles and face mask (with MSHA/NIOSH approval number prefix such as N95, R-95, or P-95), long sleeved shirt and long pants, waterproof gloves and shoes plus socks.

User Safety Requirements: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for PPE, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Users should

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

First Aid Statement	
If swallowed	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have a person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Telecommunication Network at 1-800-858-7378.	

Environmental Hazards:

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in a National Pollutant Discharge Elimination System (NPDES) permit. Do not discharge effluent containing this product to sewer systems without prior approval from the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the U.S Environmental Protection Agency (EPA).

Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal.

Storage: Keep from freezing. Store only in original tightly sealed container and out of reach of children.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into the application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into the application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Insofar as the exemption may be used by non-APHIS personnel, APHIS is securing the exemption in a representative capacity, in the public interest, to reduce the risk of spread of foot and mouth disease. Any non-APHIS user, as a condition of use of this exemption, assumes all liability associated with such use.

UNITED STATES DEPARTMENT OF AGRICULTURE
Animal and Plant Health Inspection Service
Riverdale, MD 20737-1237